

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**R. DAVID COHEN,**

**Defendant.**

**Criminal No.14-MJ-6126-MPK**

**OPPOSITION TO DEFENDANT'S MOTION TO  
RECONSIDER TRAVEL RESTRICTIONS**

The United States, by and through its undersigned attorney, hereby opposes the defendant's motion to reconsider his request to travel to Florida from December 23, 2014 through January 7, 2015. The defendant has offered no changed circumstances that would warrant a reconsideration of the Court's initial denial of this request. Although the defendant has surrendered his passport, allowing him to go to Florida with its proximity to other destination points affords him a greater opportunity to flee. Nor has the defendant provided a reason for his trip, although one might surmise it is for a vacation, which is not a particularly compelling reason. And given that the pre-trial services officer was concerned enough to request the Court to order a mental health examination, the travel restrictions imposed by the Court are a prudent condition as well to monitor the defendant's status.

For the foregoing reasons, the United States requests the Court deny the defendant's motion for reconsideration.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ S. Theodore Merritt  
S. Theodore Merritt  
Assistant U.S. Attorney

Dated: December 22, 2014

**Certificate of Service**

I hereby certify that, on the above date, this document was filed through the ECF system which sends copies electronically to the registered participants.

By: /s/ S. Theodore Merritt  
S. Theodore Merritt  
Assistant U.S. Attorney